

F. No. No. 6/54/2025-DGTR
Government of India
Department of Commerce
Ministry of Commerce & Industry
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building 5, Parliament Street, New Delhi – 110001

Dated: 11th November 2025

To,

All interested parties

Subject: PUC/PCN methodology in the countervailing duty investigation concerning imports of “Aluminium Foil 80 micron and below” originating in or exported from China PR

1. Attention of all interested parties is invited to the above-mentioned investigation initiated vide Notification No. 6/54/2025-DGTR dated 29th September, 2025. The non-confidential version of the application filed by the domestic industry was intimated to all interested parties vide Letter/Email dated 7th October 2025.
2. Whereby, the interested parties were granted an opportunity to present their comments on the scope of the product under consideration (PUC), and product control number (PCN) methodology, within a period of 15 days from the date of intimation, which ended on **22nd October 2025**.
3. The product under consideration was defined as under:

“Aluminium Foil whether or not printed or backed with paper, paper board, plastics or similar packaging materials of a thickness of 80 microns and below (with permissible tolerances) excluding the following:

- a) Aluminium Foil Composite—Aluminium foil laminated with or backed with Kraft paper and glass scrim or glass cloth with or without polyethylene, whether printed or not printed. Aluminium foil laminated with or backed with Kraft paper however is within the scope of the product under consideration and proposed measures.*
- b) Etched or formed Aluminium Foils- Etched or formed Aluminium Foils is Aluminium Foil meant to be used in the manufacture of Electrolytic Capacitor.*
- c) Aluminium composite panel- Aluminium composite panel is a non-aluminium core (often PE) bonded between two thin layers of aluminium, for use in façade cladding and signage.*
- d) Clad with compatible non clad Aluminium Foil- Clad with compatible non clad aluminium foil is a corrosion-resistant Aluminium sheet formed from Aluminium surface layers metallurgically bonded to high-strength Aluminium alloy core material for use in engine*

cooling and air conditioner systems in automotive industry; such as radiator, condenser, evaporator, intercooler, oil cooler and heater.

- e) Aluminium Foil for beer bottle- Aluminium Foil of 10.5 micron with rough surface and perforated whether printed or not; to be used in beer bottle
- f) Aluminium-Manganese-Silicon based and/or clad Aluminium-Manganese-Silicon based allows, whether clad or unclad- with post brazing yield strength greater than 35 MPA, falling under tariff heading 7607 for use in heat exchangers including radiators, charge air coolers, condensers, oil coolers, heater cores, evaporators, heat ventilation and air conditioning (HVAC) systems and parts thereof”

4. The PCN methodology was considered as below:

SN	Type of Foil	Micron Range	Bare / Converted	PCN Codes
(1)	(2)	(3)	(4)	(5)
1	Alu Alu Stock/Foil	40-60	Bare Foil	ASBF
2	House Foil/Home Foil	8-22	Bare Foil	HFBF
3	Light Gauge (LG)	7- < 20	Bare Foil	LGBF
4	Medium Gauge (MG)	20-60	Bare Foil	MGBF
5	Semi Rigid Container (SRC)	30-80	Bare Foil	SRBF
6	Ultra-Light Gauge Bare	0- <7	Bare Foil	UGBF
7	Battery Foil	9-20	Bare Foil	BFBF
8	Capacitor	4.5 - 20	Bare Foil	CFBF
9	*Any other Bare Foil (not falling within S.No.1-8)		Bare Foil	OFBF
10	Cigarette Foil	5.5-7	Converted	CFCF
11	Alu Alu Converted / laminated	40-60	Converted	ASCF
12	House/home Foil Converted	8-22	Converted	HFCF
13	SRC Converted	30-80	Converted	SRCF
14	Medium Gauge (MG) Converted	20-60	Converted	MGCF
15	Light Gauge (LG) Converted	7-<20	Converted	LGCF
16	Battery Foil Converted	9-20	Converted	BFCF
17	Any other converted Foil (Not falling within S.No. 10-16)		Converted	OFCF
18	Ultra-Light Gauge Bare	0- <7	Converted	UGBF

5. Based on comments received from the interested parties, the Authority clarified the scope of the product under consideration and the PCN methodology as below:

Scope of the product under consideration

“Aluminium Foil whether or not printed or backed with paper, paper board, plastics or similar packaging materials of a thickness of 80 microns and below (with permissible tolerances) excluding the following:

- a) Aluminium Foil Composite—Aluminium foil laminated with or backed with Kraft paper and glass scrim or glass cloth with or without polyethylene, whether printed or not printed. Aluminium foil laminated with or backed with Kraft paper however is within the scope of the product under consideration and proposed measures.*
- b) Etched or formed Aluminium Foils- Etched or formed Aluminium Foils is Aluminium Foil meant to be used in the manufacture of Electrolytic Capacitor.*
- c) Aluminium composite panel- Aluminium composite panel is a non-aluminium core (often PE) bonded between two thin layers of aluminium, for use in façade cladding and signage.*
- d) Clad with compatible non clad Aluminium Foil- Clad with compatible non clad aluminium foil is a corrosion-resistant aluminium sheet formed from aluminium surface layers metallurgically bonded to high-strength aluminium alloy core material for use in engine cooling and air conditioner systems in automotive industry and industrial applications; such as radiator, condenser, evaporator, intercooler, oil cooler and heater.*
- e) Aluminium Foil for beer bottle- Aluminium Foil of 10.5 micron with rough surface and perforated whether printed or not; to be used in beer bottle*
- f) Aluminium-Manganese-Silicon based and/or clad Aluminium-Manganese-Silicon based allows, whether clad or unclad- with post brazing yield strength greater than 35 MPA, falling under tariff heading 7607 and 7606, for use in heat exchangers including radiators, charge air coolers, condensers, oil coolers, heater cores, evaporators, heat ventilation and air conditioning (HVAC) systems and parts thereof*
- g) Adhesive tapes*
- h) Colour coated aluminium foil- either one side or both sides, irrespective of colour, shape or coating*
- i) Polyurethane coated aluminium foil- either one side or both sides, irrespective of colour, shape or coating.”*

PCN Methodology

SN	Type of Foil	Micron Range	Bare / Converted	PCN Codes
(1)	(2)	(3)	(4)	(5)
1	Alu Alu Stock/Foil	40-60	Bare Foil	ASBF
2	House Foil/Home Foil	8-22	Bare Foil	HFBF
3	Light Gauge (LG)	7- < 20	Bare Foil	LGBF
4	Medium Gauge (MG)	20-60	Bare Foil	MGBF
5	Semi Rigid Container (SRC)	30-80	Bare Foil	SRBF
6	Ultra-Light Gauge Bare	0- <7	Bare Foil	UGBF
7	Battery Foil	9-20	Bare Foil	BFBF
8	Capacitor	4.5 - 20	Bare Foil	CFBF

9	*Any other Bare Foil (not falling within S.No.1-8)		Bare Foil	OFBF
10	Cigarette Foil	5.5-7	Converted	CFCF
11	Alu Alu Converted / laminated	40-60	Converted	ASCF
12	House/home Foil Converted	8-22	Converted	HFCF
13	SRC Converted	30-80	Converted	SRCF
14	Medium Gauge (MG) Converted	20-60	Converted	MGCF
15	Light Gauge (LG) Converted	7-<20	Converted	LGCF
16	Battery Foil Converted	9-20	Converted	BFCF
17	Ultra-Light Gauge Converted	0- <7	Converted	UGCF
18	Any other converted Foil (Not falling within S.No. 10-17 would cover 0 to 80 micron only)		Converted	OFCF

6. Accordingly, all interested parties are directed to file their questionnaire response i.e. EQR/IQR/UQR/EIQ along with PCN wise information, within 15 days from the date of this PUC/PCN methodology notification, i.e. **28th November 2025**.
7. This communication is limited to clarifying the scope of the product under consideration for which the present investigation is being conducted. This does not preclude interested parties from providing relevant information and evidence to substantiate their requests for exclusion for any particular product. The Authority shall decide the scope of the product under consideration for any measures recommended, after considering relevant information and evidence furnished by all interested parties during the course of investigation.
8. This issues with the approval of the Designated Authority.

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